

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

VICTORIA GRAUDINS, on behalf of herself and all others similarly situated,)	
)	Civil Action No.: 14-02589
)	
Plaintiff,)	
)	
v.)	
)	
KOP KILT, LLC d/b/a/ THE TILTED KILT)	
PUB; VINCENT PIAZZA; and DOE)	
DEFENDANTS 1-10,)	
)	
Defendants.)	
)	
)	

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND COLLECTIVE ACTION SETTLEMENT, CERTIFICATION
OF SETTLEMENT CLASS, APPOINTMENT OF CLASS COUNSEL,
APPROVAL OF PROPOSED CLASS NOTICE, DISMISSAL OF ADDITIONAL
DEFENDANTS, AND SCHEDULING OF A FINAL APPROVAL HEARING**

Plaintiff Victoria Gaudins (“Plaintiff”), by her counsel Connolly Wells & Gray, LLP and Kalikhman & Rayz, LLC (collectively, “Plaintiff’s Counsel”), individually and on behalf of the other members of the proposed Settlement Class¹, respectfully move the Court for an order: (1) granting preliminary approval of the proposed settlement (“Settlement”) of the above captioned action pending in this Court; (2) certify, for settlement purposes only, Plaintiff’s claims pursuant to FED. R. CIV. P. 23(b)(3); (3) appoint Plaintiff as the class representative and Plaintiff’s Counsel as “Class Counsel” pursuant to FED. R. CIV. P. 23; (4) approve the form and manner of notice to be provided to the putative Settlement Class; (5) set a Bar Date of sixty days after dissemination of Class Notice; (6) dismiss with prejudice Defendant Vincent Piazza and the Doe

¹ All capitalized terms used in this Motion shall have the meanings ascribed to them in the Settlement Agreement.

Defendants; and (7) set a date for a Final Approval Hearing at least one hundred and one days after entry of a Preliminary Approval Order.² In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and Declaration of Gerald D. Wells, III and exhibits thereto.

Dated: February 12, 2016

Respectfully submitted,

CONNOLLY WELLS & GRAY, LLP

/s/ Gerald D. Wells, III

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Counsel for Plaintiff and the Proposed Class

² The Parties request the hearing be scheduled at such time so as to permit the Parties sufficient time to accomplish each of the requirements set forth in the Settlement Agreement.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th day of February 2016, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Gerald D. Wells, III
Gerald D. Wells, III